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UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

MICROSOFT CORPORATION and
 ACTIVISION BLIZZARD, INC.,

Defendants.

Case No. 3:22-cv-02880-JSC

**DECLARATION OF BETH WILKINSON
 IN SUPPORT OF DEFENDANT
 MICROSOFT CORPORATION AND
 DEFENDANT ACTIVISION BLIZZARD
 INC.'S ADMINISTRATIVE MOTION TO
 FILE UNDER SEAL ITS OPPOSITION TO
 PLAINTIFF'S MOTION FOR
 PRELIMINARY INJUNCTION**

Date: TBA
 Time: TBA
 Dept.: Courtroom 8—19th Floor
 Judge: Honorable Jacqueline S. Corley

1 I, Beth Wilkinson, hereby declare under penalty of perjury that the following is true and correct:

2 1. I am a Partner at Wilkinson Stekloff LLP and am counsel for Defendant Microsoft
3 Corporation (“Microsoft”) in the above-captioned matter. I am a member in good standing of the Bar of
4 the District of Columbia. I submit this Declaration in support of Microsoft’s Administrative Motion to
5 File Under Seal Opposition to Plaintiff’s Motion for Preliminary Injunction (“Opposition”), filed
6 concurrently herewith.

7 2. I have personal knowledge of the facts set forth in this Declaration and, if called as a
8 witness, could and would competently testify to them.

9 3. The Opposition contains non-public and highly sensitive information from documents
10 obtained during the course of the FTC’s investigation and during litigation discovery, including, but not
11 limited to, confidential, proprietary information relating to Defendants’ internal decision-making
12 processes, investment decisions, strategic evaluation of forward-looking opportunities, market share
13 analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential
14 agreements, revenue figures and projections, and internal presentations discussing business strategy.

15 4. The Opposition is entitled to confidentiality under Local Rule 79-5 because it references
16 or reflects Microsoft’s confidential, proprietary information concerning the above.

17 5. Attached as Exhibit A is a true and correct copy of the unredacted Opposition.

18 6. Attached as Exhibit B is a true and correct copy of the redacted Opposition.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is true
20 and correct to the best of my knowledge

21
22 Dated: June 16, 2023

Respectfully submitted,

23
24 By: /s/ Beth Wilkinson

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